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Counsel for Plaintiff International Fur Trade Federation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

INTERNATIONAL FUR TRADE
FEDERATION, an unincorporated association;

Plaintiff,

– against –

CITY AND COUNTY OF SAN FRANCISCO;
and

DR. GRANT COLFAX, an individual, in his
official capacity as Director of the San
Francisco Department of Public Health;

Defendants,

and

THE HUMANE SOCIETY OF THE UNITED
STATES; and

ANIMAL LEGAL DEFENSE FUND;

Intervenor-Defendants

Case No. 3:20-cv-00242-RS

**DECLARATION OF MICHAEL
TENENBAUM IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER RE IFF'S COMBINED
OPPOSITION TO MOTIONS TO DISMISS**

1 I, Michael Tenenbaum, declare as follows:

2 1. I am a lawyer duly licensed in the State of California. I represent the Plaintiff
3 International Fur Trade Federation (“IFF” or “Plaintiff”) in this action. I have personal knowledge of
4 the facts set forth in this declaration and could competently testify to such facts if called upon to do so.
5 So as to avoid the burden on the Court of multiple declarations, I am filing only this declaration in
6 support of the accompanying Stipulation and Proposed Order, having first shared a draft of it with
7 counsel for Defendants and counsel for Intervenors and received no objection to doing so.

8 2. While the briefing schedule on Defendants’ and Intervenors’ separate motions to
9 dismiss contemplated that IFF would file an opposition to Defendants’ motion by May 25, 2020, and a
10 separate opposition to Intervenors’ motion, as I was preparing the oppositions I determined that I
11 could avoid the duplication of effort for the Court (and for myself) that filing two separate opposition
12 briefs would entail. Having informed counsel for Defendants and for Intervenors, I filed a single brief
13 containing IFF’s combined opposition to both Defendants’ and Intervenors’ motions, which I filed on
14 May 27, 2020.

15 3. While I was able to combine IFF’s opposition to both motions (which motions were 24
16 and 15 pages, respectively), and would have been able to take up to 25 pages to oppose each in
17 separate briefs under Civil L.R. 7-3(a), IFF’s combined opposition is 29 pages (even after substantial
18 editing over two additional days to reduce its original size), which exceeds the ordinary page limit for
19 a single brief.

20 4. In light of the foregoing, I certainly agree to Defendants’ and Intervenors’ request for
21 an additional day for their reply briefs.

22 I declare under penalty of perjury of the laws of the United States that the foregoing is true and
23 correct.

24 Dated: May 28, 2020

/s/ Michael Tenenbaum

Michael Tenenbaum